

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:  BAYOU STEEL BD HOLDINGS, L.L.C., <i>et al.</i> , <sup>1</sup>  Debtors.	Chapter 7  Case No. 19-12153 (KBO)  (Jointly Administered)
GEORGE L. MILLER, in his capacity as Chapter 7 Trustee for the jointly administered bankruptcy estates of Bayou Steel BD Holdings, L.L.C., <i>et al.</i> ,  Plaintiff,  v.  BLACK DIAMOND CAPITAL MANAGEMENT, L.L.C.; BDCM OPPORTUNITY FUND IV, L.P.; BLACK DIAMOND COMMERCIAL FINANCE, L.L.C.; SAM FARAHNAK; PHIL RAYGORODETSKY; ROB ARCHAMBAULT; TERRY TAFT; and BOB UNFRIED,  Defendants.	Adv. Proc. No.: 21-51013 (KBO)  <b>RE: Adv. D.I. 1, 25, 26, 27, 28, 29, 31, 35, 46, 47, 48, 49</b>

**JOINT NOTICE OF COMPLETION OF BRIEFING**

PLEASE TAKE NOTICE that briefing concerning (a) the *Independent Directors' Motion to Dismiss* [Adv. D.I. 25] and (b) *Defendants Black Diamond Capital Management, L.L.C.*,

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are Bayou Steel BD Holdings, L.L.C., a Delaware limited liability company (1984), BD Bayou Steel Investment, LLC, a Delaware limited liability company (1222), and BD LaPlace, LLC, a Delaware limited liability company (5783).

*BDCM Opportunity Fund IV, L.P., Black Diamond Commercial Finance, L.L.C, Sam Farahnak, and Phil Raygorodetsky's Motion to Dismiss* [Adv. D.I. 27] has been completed.

Pleadings relevant to these matters are as follows:

1. Complaint, filed 8/11/2021 [Adv. D.I. 1];
2. Independent Directors' Motion to Dismiss, filed 11/22/2021 [Adv. D.I. 25];
3. Opening Brief in Support of Independent Directors' Motion to Dismiss, filed 11/22/2021 [Adv. D.I. 26];
4. Defendants Black Diamond Capital Management, L.L.C., BDCM Opportunity Fund IV, L.P., Black Diamond Commercial Finance, L.L.C, Sam Farahnak, and Phil Raygorodetsky's Motion to Dismiss, filed 11/22/2021 [Adv. D.I. 27];
5. Memorandum in Support of Defendants Black Diamond Capital Management, L.L.C., BDCM Opportunity Fund IV, L.P., Black Diamond Commercial Finance, L.L.C, Sam Farahnak, and Phil Raygorodetsky's Motion to Dismiss, filed 11/22/2021 [Adv. D.I. 28];
6. [SEALED] Declaration of William J. Trunk in Support of Motion to Dismiss, filed 11/22/2021 [Adv. D.I. 29];
7. Proposed Order Dismissing Complaint, filed 11/22/2021 [Adv. D.I. 31];
8. Plaintiff's Omnibus Memorandum of Law in Opposition to Defendants' Motions to Dismiss, filed 1/24/2022 [Adv. D.I. 35];
9. Reply in Support of Defendants Black Diamond Capital Management, L.L.C., BDCM Opportunity Fund IV, L.P., Black Diamond Commercial Finance, L.L.C, Sam Farahnak, and Phil Raygorodetsky's Motion to Dismiss, filed 2/28/2022 [Adv. D.I. 46];
10. Reply Brief in Support of Independent Directors' Motion to Dismiss, filed 2/28/2022 [Adv. D.I. 47];
11. Request for Oral Argument, filed 3/3/2022 [Adv. D.I. 48]; and
12. Request for Oral Argument, filed 3/3/2022 [Adv. D.I. 49].

Counsel respectfully submits that these matters are ready for disposition.

Dated: March 10, 2022  
Wilmington, Delaware

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**CERTIFICATE OF SERVICE**

I, Kevin M. Capuzzi, hereby certify that, on March 10, 2022, a true and correct copy of the foregoing *Joint Notice of Completion of Briefing* was served via CM/ECF on the parties listed below:

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